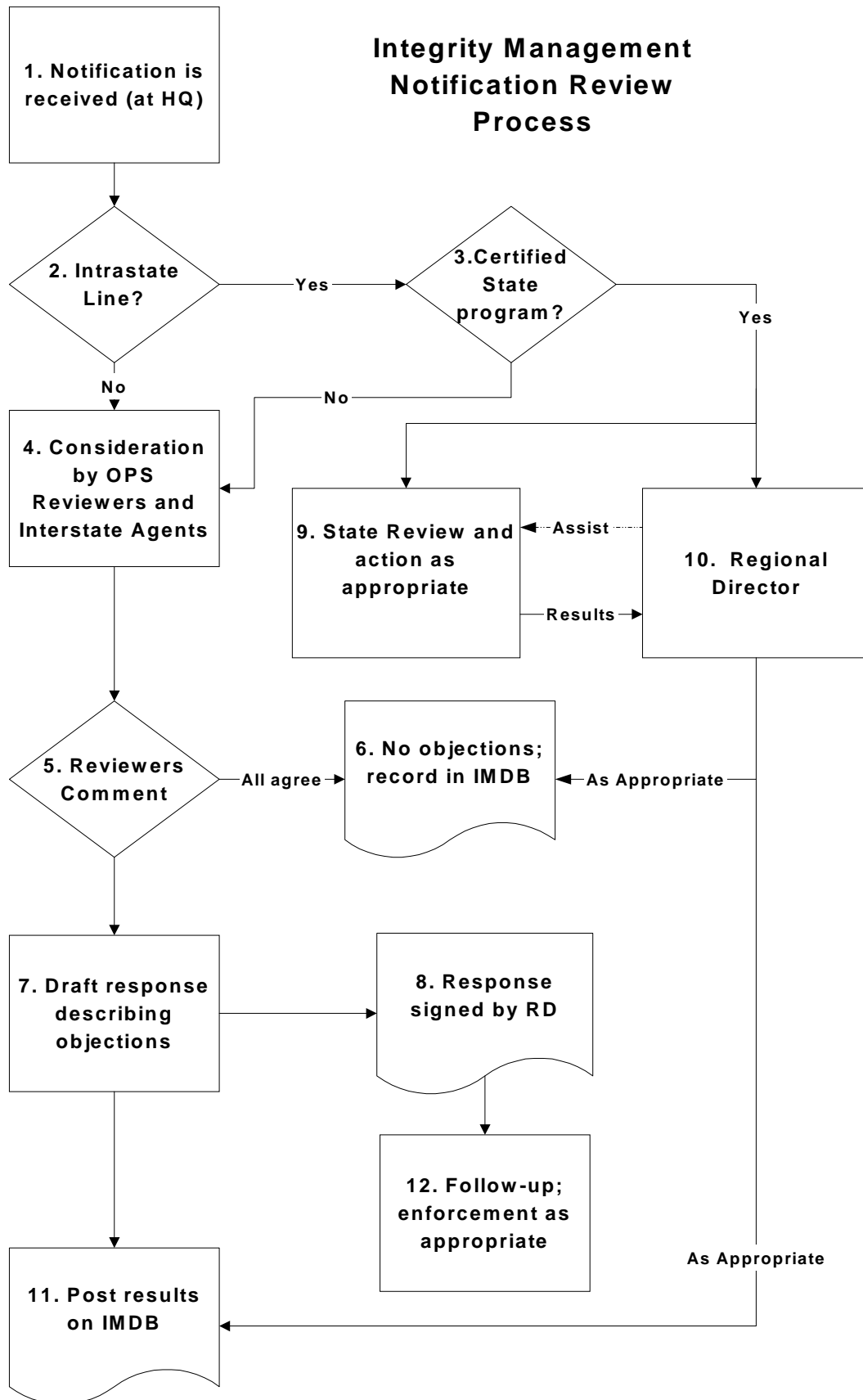


## Integrity Management Notification Review Process



## **Integrity Management Notification Review Process**

The integrity management rule (49 CFR 192 Subpart O) requires operators to notify OPS (and appropriate state regulators) in three circumstances

1. When making substantial changes to their Integrity Management Programs
2. When unable to meet required repair schedules or provide safety by interim pressure reduction
3. When they intend to use “other technology” to perform assessments

Notification in these situations affords OPS the opportunity to review the circumstances to determine whether they create a need for early inspection and possible enforcement action. In making this determination, OPS intends to use the following process (step numbers refer to the numbered boxes on the flow chart):

1. The integrity management rule requires that notifications be submitted to OPS headquarters in writing, by facsimile, or via the Integrity Management Database (IMDB) web site (<http://primis.rspa.dot.gov/gasimp/>). OPS Headquarters will screen notifications as they are received to verify that they pertain to one of the circumstances in the rule for which a notification is required.
2. OPS will determine, based on information included in the notification, whether the pipeline segment involved is an intrastate line potentially subject to state jurisdiction.
3. OPS will determine if an intrastate line is located in a state that has a certified pipeline regulatory program. At present, the District of Columbia and all states except Alaska, Hawaii, and Delaware exercise enforcement authority over intrastate pipelines in their states.
4. Notifications concerning interstate pipeline segments (and intrastate pipeline segments in states not having certified programs or with 60106 agreements) will be considered by OPS reviewers. Reviewers will typically include all Regional Directors and subject matter experts as appropriate. States that are interstate agents will also participate in this review for pipelines in their states.
5. Each OPS reviewer will note whether he/she notes any basis to object to the actions proposed by the operator, indicating a possible need for a special inspection. These comments will be reviewed by OPS headquarters. The process will repeat until agreement is reached.

6. If all reviewers agree there are no objections, the notification status in IMDB will be revised to so state. (This status will also display on the public web site, as described below).
7. OPS will draft a letter to the operator in instances in which objections are noted, describing the basis for the objections and additional actions the operator can take to reduce the need for a special inspection.
8. The response to the operator, in instances in which objections are noted, will be signed by the appropriate OPS Regional Director or his/her designee.
9. States with certified pipeline regulatory programs are responsible for review of notifications concerning intrastate lines under their jurisdiction. These reviews will be conducted by the state using procedures the state finds appropriate to its circumstances. The purpose of the state review, again, will be to determine if the state has technical objections to the alternative actions described in the notification (which may create a need for a special inspection), and to take appropriate action with the operator if such objections are noted. OPS will forward notifications subject to state reviews to state program officials, along with information regarding any similar notifications previously reviewed.
10. The cognizant OPS Regional Director will receive copies of notifications forwarded to states for review. The Regional Director will provide assistance as appropriate. States will inform the Regional Director of the results of their review, including providing copies of any relevant correspondence. The Regional Director will assure these results are recorded in IMDB, as appropriate.
11. The notification status in IMDB will be changed to show that objections have been noted, or to reflect the results of state reviews. Objections communicated to an operator will be posted.
12. OPS will follow-up with operators who receive letters informing them of technical objections to their notifications to determine whether the operator plans to change its intended actions. Special inspections will be conducted as needed. Enforcement action will be taken in cases where it is determined that operators are not in compliance with the regulation.

Each operator will have access to records of its own notifications on IMDB. The operator's primary contact (as indicated in the notification record) will receive an e-mail informing him/her each time the status of a notification is changed in the database.

Summary information regarding all notifications will be available on the Implementing Integrity Management website, (<http://primis.rspa.dot.gov/iim>), available to the general public. This information will include a summary description of the notification, the review status (under review, no objections, objections noted) and a summary of any objections that have been

communicated to the operator.